

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE
COMPANY, et al.,

Plaintiffs,

VS.

ABBOTT LABORATORIES,

Defendant.

Civil Action No. 05-11150-DPW
Hon. Judge Douglas P. Woodlock

MOTION FOR ADMISSION PRO HAC VICE OF STEPHEN D'AMORE

Pursuant to Local Rule 83.5.3, the undersigned counsel hereby moves that Stephen D'Amore of Winston & Strawn LLP, 35 W. Wacker Drive, Chicago, IL 60601-9703, be admitted to appear on behalf of defendant Abbott Laboratories, and to practice before this Court in the above-entitled action. As grounds for this motion, the undersigned counsel respectfully represents the following:

1. Mr. D'Amore is and has been a member in good standing of the bar of the State of Illinois since 1994;

2. Mr. D'Amore is and has been a member in good standing of the bars of the following United States District Courts, and Circuit Courts of Appeals since the following dates:

Northern District of Illinois 1996

Seventh Circuit 1999

3. There are no disciplinary proceedings pending against Mr. D'Amore as a member of the bar in any jurisdiction;

4. Mr. D'Amore has represented to the undersigned counsel that he is familiar with

the Local Rules of the United States District Court for the District of Massachusetts; and

5. In further support of this motion, Mr. D'Amore has submitted herewith his Certificate of Good Standing as required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully moves Mr. D'Amore's admission to practice before this Court *pro hac vice*.

Respectfully submitted,

/s/ Michael S. D'Orsi

Peter E. Gelhaar (BBO #188310)

Michael S. D'Orsi (BBO #566960)

DONNELLY, CONROY & GELHAAR, LLP

One Beacon Street, 33d Floor

Boston, MA 02108

(617) 720-2880

Dated: August 8, 2005

CERTIFICATE OF GOOD STANDING

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Stephen D'Amore, Esq., hereby certify that: (1) I am admitted to the bars of the Courts set forth in the foregoing motion; (2) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice; (3) No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction; and (4) I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Respectfully submitted,

/s/ Stephen D'Amore, Esq.
Stephen D'Amore, Esq.

Dated: August 8, 2005

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

The undersigned hereby certifies he has conferred with counsel for John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and ManuLife Insurance Company (“John Hancock”) and John Hancock does not oppose this Motion.

/s/Michael S. D’Orsi
Michael S. D’Orsi

Dated: August 8, 2005